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Kurt A. Gustafson, Francois Lebel, William L. Ashton,  
Nora E. Brennan, Seth H.Z. Fischer, Jeffrey L. Vacirca,  
Dolatrai M. Vyas, Bernice R. Welles, Stuart Krassner,  
Raymond W. Cohen, Anthony E. Maida, and  
Elizabeth A. Czerepak and for Nominal Defendant  
Spectrum Pharmaceuticals Inc*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JEFFRY JOHNSON, Derivatively on Behalf  
of SPECTRUM PHARMACEUTICALS INC.,

Plaintiff,

v.

JOSEPH W. TURGEON, KURT A.  
GUSTAFSON, FRANCOIS LEBEL,  
WILLIAM L. ASHTON, NORA E.  
BRENNAN, SETH H.Z. FISCHER,  
JEFFREY L. VACIRCA, DOLATRAI M.  
VYAS, BERNICE R. WELLES, STUART  
KRASSNER, RAYMOND W. COHEN,  
ANTHONY E. MAIDA, and ELIZABETH A.  
CZEREPAK,

Defendants,

and

SPECTRUM PHARMACEUTICALS INC.,

Nominal Defendant.

CASE NO. 2:22-CV-00538-JCM-NJK

**STIPULATION AND  
ORDER GRANTING DISMISSAL OF  
PLAINTIFF'S VERIFIED DERIVATIVE  
COMPLAINT**

Plaintiff Jeffry Johnson ("Plaintiff"), derivatively and on behalf of nominal defendant Spectrum Pharmaceuticals Inc. ("Spectrum" or the "Company"), and defendants Joseph W. Turgeon, Kurt A. Gustafson, Francois Lebel, William L. Ashton, Nora E. Brennan, Seth H.Z. Fischer, Jeffrey L. Vacirca, Dolatrai M. Vyas, Bernice R. Welles, Stuart Krassner, Raymond W. Cohen, Anthony E. Maida, and Elizabeth A. Czerepak ("Defendants" and together with the Plaintiff

and Spectrum, the “Parties”) jointly submit this Stipulation (“Stipulation”), and in support thereof state as follows:

**WHEREAS**, on March 29, 2022, Plaintiff filed the above-captioned action purportedly in the right, and for the benefit, of Spectrum against Defendants (the “Action”);

**WHEREAS**, on or about July 31, 2023, Spectrum completed a merger transaction that resulted in Plaintiff no longer being a stockholder of the Company and, accordingly, no longer having standing to pursue derivative claims on the Company’s behalf; and

**WHEREAS**, the Parties hereby certify that no compensation in any form has passed directly or indirectly to Plaintiff or its attorneys in the Action and no promise to give any such compensation has been made;

**IT IS HEREBY STIPULATED AND AGREED**, by the parties hereto that pursuant to Federal Rules of Civil Procedure 23.1(c) and 41(a), this Action is dismissed.

BRAGAR EAGEL & SQUIRE, P.C.

PISANELLI BICE PLLC

By: /s/ Melissa A. Fortunato  
Melissa A. Fortunato, Esq.  
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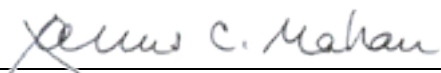
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**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT COURT JUDGE

DATED: November 14, 2024

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